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6 Attorney for **WILCOX**

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 vs.
14 CRAIG WILCOX,
15 Defendant.
16

2:13-cr-00256-LDG-PAL

UNOPPOSED MOTION TO EXTEND
SURRENDER DATE

(First Request)

17 Craig Wilcox, by and through his attorney of record, Alina M. Shell, Assistant Federal Public
18 Defender, hereby moves this Court to vacate and continue the surrender date currently scheduled for
19 July 7, 2014 at 12:00 p.m. to September 5, 2014 at 12:00 p.m.

20 This Motion is Requested for the following reasons:

21 1. Wilcox has been on pretrial release since his initial appearance in this case on
22 July 18, 2013.

23 2. On April 7, 2014, this Court ordered Wilcox to self-surrender to an institution
24 designated by the federal Bureau of Prisons (BOP) by 12:00 p.m. on July 7, 2014. (*See* Docket #24
25 (minutes of sentencing); *see also* Docket #25 (written judgment).)

26 3. That as of this date BOP has not yet designated a facility for surrender.

27 4. Wilcox seeks this extension to secure his financial affairs before surrendering to serve
28 his sentence. Wilcox recently secured employment with Hilton Cabinets in Phoenix, Arizona.

1 Wilcox requests the sixty-day extension of his surrender date so that he may continue to work for
2 Hilton Cabinets and establish a track record with the company that may persuade it to re-hire him
3 upon his release from incarceration.

4 5. Wilcox will also use this additional requested time to resolve any outstanding legal
5 matters with other jurisdictions to ensure the best designation with the Federal Bureau of Prisons.

6 6. That undersigned counsel does not intend to move for any further extensions of the
7 surrender date absent compelling exigent circumstances.

8 7. That on June 13, 2014, undersigned counsel contacted counsel for the United States,
9 Assistant United States Attorney J. Gregory Damm. The government does not oppose this motion
10 to extend Wilcox's surrender date.

11 For the foregoing reasons, counsel moves this Court to enter a one-time extension of the
12 surrender date, thereby allowing Wilcox to surrender to the designated BOP facility by
13 September 5, 2014 at 12:00 p.m.

14 DATED this 18 day of June, 2014.

15
16 RENE L. VALLADARES
17 Federal Public Defender

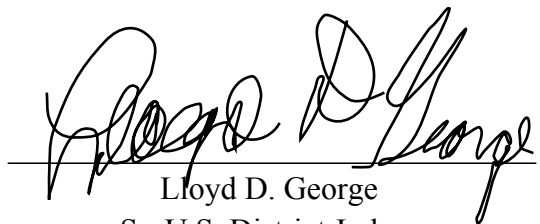
18 /s/ Alina M. Shell

19 By: _____
20 ALINA M. SHELL,
21 Assistant Federal Public Defender

22 ORDER

23 IT IS SO ORDERED.

24 DATED this 18 day of June, 2014.

25
26 
27 Lloyd D. George
28 Sr. U.S. District Judge